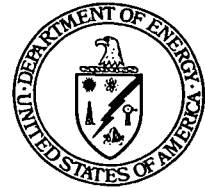




Department of Energy

Ohio Field Office Fernald Area Office

P. O. Box 538705
Cincinnati, Ohio 45253-8705
(513) 648-3155



SEP 16 1999

- 2510

Mr. James A. Saric, Remedial Project Manager
U.S. Environmental Protection Agency
Region V-SRF-5J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

DOE-1121-99

Mr. Tom Schneider, Project Manager
Ohio Environmental Protection Agency
401 East 5th Street
Dayton, Ohio 45402-2911

Dear Mr. Saric and Mr. Schneider:

**TRANSMITTAL OF RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY
COMMENTS ON THE DRAFT CERTIFICATION DESIGN LETTER FOR AREA 1, PHASE II
SECTOR 3 UTILITY TRENCHES**

Enclosed for your review are responses to the Ohio Environmental Protection Agency (OEPA) comments on the draft Certification Design Letter for Area 1, Phase II (A1PII) Sector 3 Utility Trenches. Also, enclosed is a variance in response to one of the comments.

If you have any questions or concerns regarding this document, please contact Robert Janke at (513) 648-3124.

Sincerely,

Johnny W. Reising
Fernald Remedial Action
Project Manager

FEMP:R.J. Janke

Enclosures

Mr. James A. Saric
Mr. Tom Schneider

-2-

SEP 16 1999

cc w/enclosures:

G. Jablonowski, USEPA-V, SRF-5J
T. Schneider, OEPA-Dayton (three copies of enclosures)
F. Bell, ATSDR
M. Schupe, HSI GeoTrans
R. Vandegrift, ODH
F. Barker, Tetra Tech
AR Coordinator, FDF/78

cc w/o enclosures:

N. Hallein, EM-42/CLOV
A. Tanner, OH/FEMP
D. Carr, FDF/52-2
J. Chiou, FDF/52-0
T. Crawford, FDF/52-0
A. Duarte, FDF/52-0
T. Hagen, FDF/65-2
J. Harmon, FDF/90
R. Heck, FDF/2
S. Hinnefeld, FDF/31
T. Walsh, FDF/65-2
ECDC, FDF/52-7

**RESPONSES TO OHIO ENVIRONMENTAL PROTECTION AGENCY COMMENTS
ON THE DRAFT CERTIFICATION DESIGN LETTER
FOR AREA 1, PHASE II SECTOR 3 UTILITY TRENCHES
(REVISION A)**

-- 2510

FERNALD ENVIRONMENTAL MANAGEMENT PROJECT

GENERAL COMMENT

Commenting Organization: OEPA

Commentor: OFFO

Section #:

Page #:

Line #:

Code: C

Original Comment #: 1

Comment: Ohio EPA does not approve of the manner in which DOE has been managing soil operations recently, in regards to document submittals. This CDL is a prime example. The Sitewide Excavation Plan (SEP, July 1988) clearly states in Section 7.3.2 that "certification sampling and analysis will commence immediately after a regulatory review and approval of the CDL." The work described in this CDL, received on September 7, is currently being performed without any review or approval from the Agencies. This is becoming an all too common occurrence, and the Ohio EPA expects that from this point on, all documents and field work will follow the guidelines agreed upon in the SEP.

Response: The utility trenches certification process was discussed in the Area 1, Phase II (A1PII) Supplemental Characterization Package. However, the Certification Design Letter (CDL) and Project Specific Plan (PSP), which provide significant information regarding how this work is to be performed, were not submitted in a timely manner prior to the work being performed. An enhanced effort will be made to ensure that Agency approval is received prior to certification sampling.

Action: An enhanced effort will be made to ensure that Agency approval is received prior to certification sampling.

SPECIFIC COMMENTS

Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.0

Page #: 3

Line #: 20

Code: C

Original Comment #: 2

Comment: The four WAC sample locations referred to and shown in Figure 4 are approximately 100-150 feet apart. What criteria was used to determine the number of WAC samples and the distance between the locations? When and under what document was the sampling performed? This information is not provided in the referenced section of the A1PII Supplemental Characterization Package. According to OEPA's files, we did not receive a PSP for sampling the STP Utility Trenches. Please clarify.

Response: The pipe bedding material was sampled in March 1999, under a variance to the Field Sampling of Miscellaneous Areas PSP (Document 55200-PSP-0004, Variance 50.03.59.04-11). The results and sample locations are specifically called out in the transmittal of the Final A1PII Supplemental Characterization Package. The six locations as shown on Figure 4, were used to supplement the sampling planned in the PSP (locations are shown in Figure 3). In regard to the number of samples, the general

guideline for the number of waste acceptance criteria (WAC) samples is one per Certification Unit (CU). Since the utilities are in separate CUs, two WAC samples were collected in the bedding material in CUs which would most likely contain contaminated material. The locations were field located in order to ensure that the pipe bedding was sampled.

- 2510

Action: None.

Commenting Organization: OEPA

Commentor: OFFO

Section #: 2.0

Page #: 3

Line #: 8, 20

Code: C

Original Comment #: 3

Comment: Trench 5, which is mentioned in both these sentences, does not appear on any map, nor anywhere else in this document. Section 1.2 references five CUs and four trenches. Please clarify.

Response: The section erroneously refers to Trench 5 instead of Trench 4.

Action: The text will be revised accordingly.

Commenting Organization: OEPA

Commentor: OFFO

Section #: 4.2

Page #: 7

Line #: 31-32

Code: C

Original Comment #: 4

Comment: This sentence references a PSP for Certification Sampling of Area 1, Phase III Sector 3 Utility Trench. The Agency has no record of this PSP or any under the same title for Phase II. Please clarify.

Response: The subject PSP was not included in the draft CDL submittal package, but has been submitted for your review on September 10, 1999.

Action: None.

Commenting Organization: OEPA

Commentor: OFFO

Section #: 4.2

Page #: 7

Line #: 37-38

Code: C

Original Comment #: 5

Comment: The sampling plan laid out here does not follow the plan as agreed upon in Section 4 of the A1PII Supplemental Characterization Package. Instead of the certification sample being taken from a stockpile, FDF is to 'sample the last bucket removed from the trench bottom for FRLs'. Please correct.

Response: The certification sample is from the last bucket excavated from the utility trench. The trackhoe operator is dumping the excavated soil on the ground, making a stockpile approximately 6 feet in diameter and approximately 6 inches deep, rather than pausing to allow for sampling from the bucket. The HPGe measurement and certification sample are then taken from the stockpile. To date, sixteen certification samples have been collected in this manner, however, all remaining samples will be taken from the bucket.

Action: A variance will be written to instruct that all remaining samples be collected from the bucket. The variance will be forwarded to the Agencies.

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Commenting Organization: OEPA

Commentor: OFFO

Section #: 4.3

Page #: 8

Line #: 29-32

Code: C

Original Comment #: 6

Comment: According to this section a Certification Report will be issued when all CUs within the scope of this CDL has passed certification. This contrasts what is proposed in Section 1.0 (Lines 27-30), which states that a separate Certification Report will not be submitted for this CDL. Please clarify.

Response: As stated in Section 1.0, a separate report will not be issued for the CUs covered in this CDL. However, once all the data is received, a data summary will be submitted to the Agencies. The final CU data will be submitted as part of the final A1PII Certification Report.

Action: The sentence in Section 4.3 will be revised to clarify to reference the data submittal.

VARIANCE / FIELD CHANGE NOTICE

V/F 50.03.59.04-10

WBS NO.: 50.03.59.04

Page 1 of 2

PROJECT TITLE: AIPil for Field Sampling of Miscellaneous Areas (55200-PSP-0004 Rev. 0)

Date: 2/18/99

VARIANCE / FIELD CHANGE NOTICE (Include Justification)

Field Change Notice:

This variance documents the addition of additional sampling of pipe bedding material at 6 locations inside STP and 6 outside the STP as shown on Figure 1. The following table lists the sample identification labels, locations, and Target Analyte List.

Sample IDs	Northing	Easting	Identifier on Figure 1
A1P2MIS-12418-R	1351237.88	479943.82	1 Outside of STP
A1P2MIS-12418-R-D	1351237.88	479943.82	1 Outside of STP
A1P2MIS-12419-R	1351238.05	479926.90	2 Outside of STP
A1P2MIS-12420-R	1351384.58	479935.99	3 Outside of STP
A1P2MIS-12421-R	1351384.58	479923.14	4 Outside of STP
A1P2MIS-12422-R	1351584.18	479794.79	5 Outside of STP
A1P2MIS-12423-R	1351692.47	479623.17	6 Outside of STP
A1P2MIS-12424-R	1351537.14	480078.17	7 Inside of STP
A1P2MIS-12425-R	1351617.15	480047.72	8 Inside of STP
A1P2MIS-12426-R	1351734.37	480043.85	9 Inside of STP
A1P2MIS-12427-R	1351717.66	479971.78	10 Inside of STP
A1P2MIS-12428-R	1351722.88	479924.12	11 Inside of STP
A1P2MIS-12429-R	1351727.13	480010.72	12 Inside of STP

Samples will be collected by using the Geoprobe with the objective of sampling the pipe bedding material. The Geoprobe will be advanced to a depth which goes through the bedding material into the native soil. A field geologist will examine the core and select the 6" interval bedding material above the native soil. If no distinct pipe bedding material is encountered, soil from the immediate area will be collected. A lithology log will be completed for each boring recording the depths of bedding material and native soil. All samples will be analyzed for TAL F (listed below), which consists of technetium-99 and total uranium. The sampling and analytical requirements are summarized on the following table:

TAL F for Variance 50.03.59.04-10

Analyte	Preservative	Lab	ASL	Hold time	Method	Container
Tc99	None	Onsite	B	Six Months	LSC	Capped Plastic Liner or 500 ml glass or plastic
Total U	None	Onsite	B	Six Months	ICP/MS	Capped Plastic Liner or 500 ml glass or plastic

The Tc99 and Total U sample may be combined into 1 container, provided that the total mass is greater than 350 g. Sampling will be performed by per the PSP requirements. One duplicate will be collected on sample A1P2MIS-1-R. Equipment decontamination will be performed per the requirements in PSP, however, a rinsate will not be collected.

Justification:

Original sampling failed to characterize the pipe bedding material. Since these lines have now been capped it is safe to sample the bedding material for disposition purposes.

X IF REQD	VARIANCE/FCN APPROVAL	DATE	X IF REQD	VARIANCE/FCN APPROVAL	DATE
X	QUALITY ASSURANCE <i>DA</i>	3-3-99	X	CHARACTERIZATION LEAD <i>RD</i>	2/12/99
	DATA QUALITY MANAGEMENT		X	FIELD MANAGER <i>Mike</i>	3/1/99
	ANALYTICAL CUSTOMER SUPPORT		X	AREA MANAGER <i>Mike</i>	2/20/99
	OTHER		X	WASTE ACCEPTANCE ORGANIZATION <i>Standa</i>	6/4/99
VARIANCE/FCN APPROVED [X] YES [] NO			REVISION REQUIRED: [] YES [X] NO		

DISTRIBUTION

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QUALITY ASSURANCE:	OTHER:	OTHER:
FIELD MANAGER:	OTHER:	OTHER:

ORIGINAL

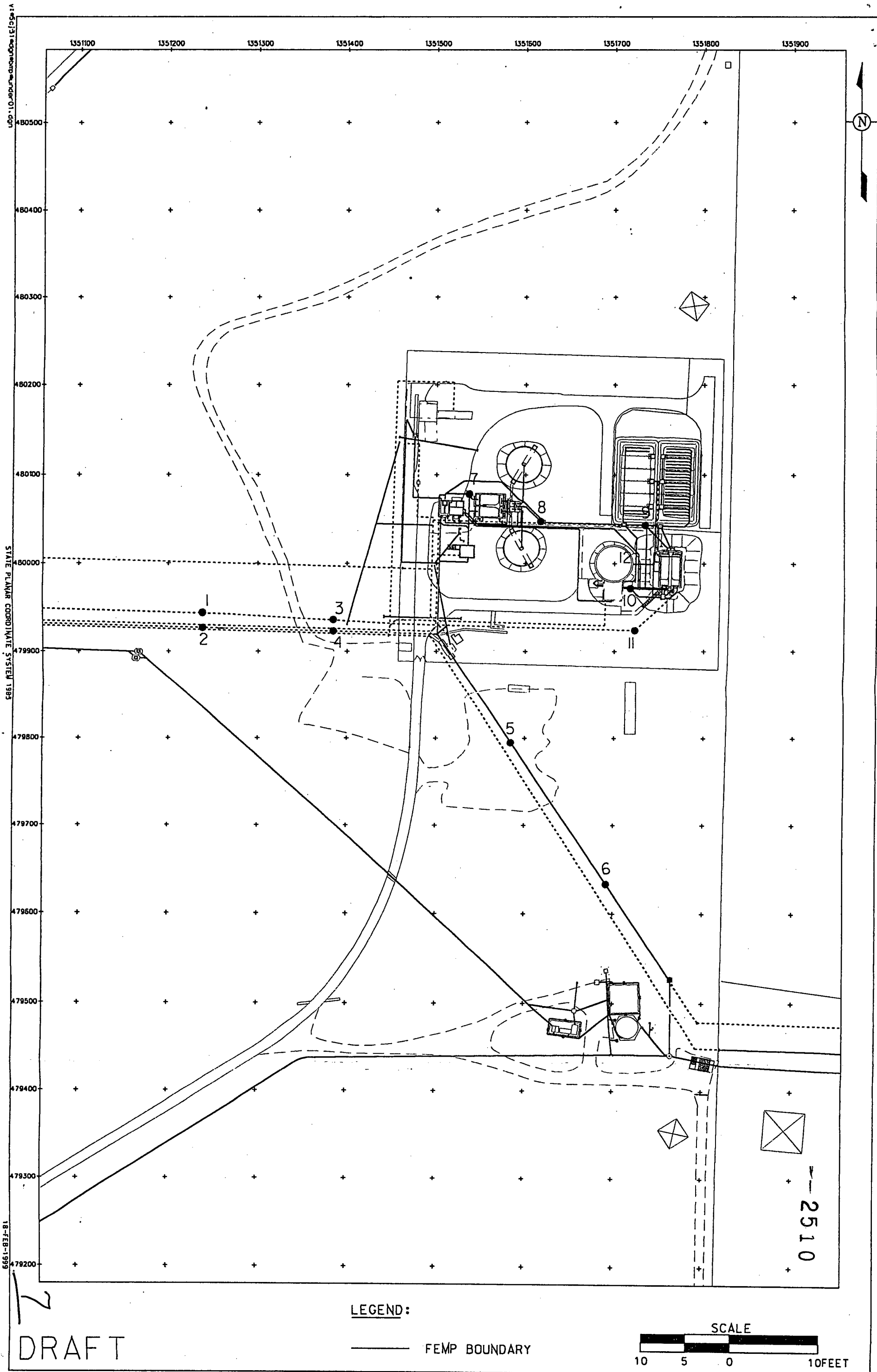


FIGURE 1. SAMPLE LOCATIONS

Variance 50.03:59.09-11
Page 2082